

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the matter of the development of a	)	
Natiowide Public Safety Wireless Data Network	)	
Comments of 700 MHz Waiver Recipients	)	
supporting the joint comments of the	)	
Adams County Communication Center, Inc, the	)	<b>PS Docket No. 06-229</b>
City of Charlotte, North Carolina, the	)	
State of Mississippi, and the	)	
State of Texas regarding PLMN ID, Network	)	
Numbering Scheme and Network Interoperability	)	

1. The Adams County Communication Center, Inc, the City of Charlotte, North Carolina, the State of Mississippi and the State of Texas have filed comments regarding Public Land Mobile Network Identification (PLMN ID), Network Numbering Scheme and Network Interoperability in this proceeding. These four jurisdictions, collectively known as the “Early Adopters”, hold FCC waivers allowing them to construct wireless LTE public safety networks in 700 MHz spectrum allocated for that purpose. These “Early Adopters” have, in their filing, requested additional guidance and action from the FCC regarding specific issues identified in the waiver orders. These “Early Adopters” are four jurisdictions of the twenty-one jurisdictions, collectively known as the “Waiver Recipients”, who are authorized to build networks under this proceeding. The twenty-one Waiver Recipients also comprise the Operator Advisory Committee (OAC) to the Public Safety Spectrum Trust (PSST).

2. The undersigned jurisdictions are part of the PSST-OAC and therefore also hold waivers from the FCC and leases with the PSST to deploy public safety wireless broadband LTE networks in the 700 MHz band. This filing indicates support support by the undersigned jurisdictions for the Early Adopters’ request for FCC action.

3. Like the Early Adopters, we also believe a common PLMN ID across all networks is the most efficient and productive approach to numbering and identifying the elements of our networks. On December 2, 2011 the Public Safety Spectrum Trust Operator Advisory Committee (PSST-OAC) formally requested the Alliance for Telecommunications Industry Solutions, IMSI Oversight Council (“ATIS IOC”), which maintains the PLMN IDs, to issue an operational PLMN ID for use by public safety networks. We support the Early Adopters request for the FCC to formally support this request to ATIS-IOC, and we ask that, no later than February 1, 2012, the PLMN ID is identified and the Waiver Recipients and Early Adopters have the authority to use it.

4. Like the Early Adopters, we, the undersigned, support the Public Safety Communications Research (PSCR) process for developing a numbering scheme for the networks. We support the Early Adopters' request that the final Numbering Scheme developed through the PSCR process and released by PSCR be adopted as the framework for the nationwide network. We support the Early Adopters request for flexibility in implementing and allocating the framework, specifically: (a) optimizing the allocation blocks, (b) distributing the IMSI/MSIN ranges across the 9<sup>th</sup>, 8<sup>th</sup> and 7<sup>th</sup> significant digits and (c) adding blocks of reserves among the state allocations. As with the PLMN ID, we request the FCC take action on this as soon as possible so the initial allocations can be made by February 1, 2012.
5. We, the undersigned, support and echo the call of the Early Adopters for the FCC to allow the Waiver Recipients, with the assistance of the Department of Homeland Security's Office of Emergency Communications ("OEC"), the authority to distribute the initial allocations and maintain the scheme during these initial deployments.
6. We, the undersigned Waiver Recipients, understand the FCC's directives requiring internetworking and interoperability among networks as each Early Adopter and Waiver Recipient network becomes operable. We echo the concerns of the Early Adopters that there are many challenges to creating such interoperability. We support the Early Adopters' request that the FCC work with us to develop a solution using third-party organizations that specialize in interconnecting commercial carriers. We commit to work with and support the Early Adopters as they develop a "trial" solution for interoperability among the four initial networks that would validate the feasibility of LTE interoperability and roaming. Our support for this trial solution does not commit any of the Early Adopters or Waiver Recipients to financial liability for any proposed solutions.
7. We, the undersigned, support the Early Adopters' request that the Commission endorse and allow public safety, initially represented by the current 21 Waiver Recipients, to contract with a competent third party to provide the interconnection, roaming, design, operation and network services required to support the functionality required to enable LTE roaming as the nationwide network expands.

Respectfully submitted,

/s/

The Bay Area Regional Interoperable  
Communications System  
By David Kozicki

/s/

The City of Boston  
By Donald Denning  
Public Safety CIO

/s/

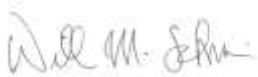
The City of Chesapeake  
By Bernie Reaser  
Radio Systems Administrator

/s/

The State of Iowa  
By Dina McKenna  
Chair, Iowa Statewide Interoperable  
Communications System Board

/s/

The State of Oregon  
By Steve Noel, Operations Manager  
Oregon Wireless Interoperability Network



The City of Seattle, Washington  
By William M. (Bill) Schrier  
Chief Technology Officer



Foxcomm supporting the Wisconsin  
Counties of Calumet, Outagamie, and  
Winnebago  
By Thomas Swadley